

March 20, 2025

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

CIVIL ACTION FILE NO.

vs.

1:24-cv-02911-SDG

WENDELL HOLMES, JR.,

Defendant.

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DEPOSITION OF  
WENDELL HOLMES, JR.

March 20, 2025

1:10 p.m.

125 Clairemont Avenue

Suite 450

Decatur, Georgia

Nancy G. Lucas, CCR, 1366-B

1 APPEARANCES OF COUNSEL

2 On Behalf of the Plaintiff:

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10 On Behalf of the Defendant:

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17 (The original exhibits were inadvertently  
18 taken from the conference room by the witness.

19 Mr. Weeks supplied copies of the original exhibits to  
20 the court reporter and these will be attached to  
21 original transcript.)

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25

1 Deposition of  
2 Wendell Holmes, Jr.  
3 March 20, 2025

4 MR. WEEKS: This will be the deposition of  
5 Wendell Holmes, Jr., taken pursuant to order of  
6 Judge Grimberg and a notice of deposition.

7 It's taken for all purposes allowed under the  
8 Federal Rules of Evidence and the Federal Rules of  
9 Civil Procedure.

10 You may swear in the witness.

11 WENDELL HOLMES, JR., being first duly sworn, was  
12 examined and testified as follows:

13 CROSS-EXAMINATION

14 BY MR. WEEKS:

15 Q. Good afternoon, Mr. Holmes. My name is Joseph  
16 Weeks. I don't think we've met before in person, but I  
17 represent Natalie Soto in a lawsuit that's been filed  
18 against you in federal court. Okay?

19 A. (Witness nods head.)

20 Q. Is that a yes?

21 A. Yes. But it was a statement, not a question.

22 Q. Okay. Have you ever given a deposition  
23 before?

24 A. Never.

25 Q. Okay. I'm going to go over a few things that  
will help us here today to move things along. As best

1 as you can, if you can let me finish my question before  
2 you start to answer my question and I'll let you finish  
3 your answer before I come back in; fair enough?

4 A. Yeah.

5 Q. And what that will do is allow the court  
6 reporter to get a clear record of what's being taken  
7 down today.

8 As best you can, if I ask a question that  
9 calls for a yes or no answer, if you can say yes or no,  
10 as opposed to uh-huh, huh-uh or head nods, that also  
11 will help us get a really clear and the best transcript  
12 we can; okay?

13 A. Okay.

14 Q. If I ask a question that you don't understand  
15 for any reason, either be it you don't understand the  
16 words I'm using, you just think it's a bad question,  
17 please ask me to rephrase the question; okay?

18 A. Okay.

19 Q. If you answer my question, I'm going to assume  
20 that you understood what I was asking; is that fair?

21 A. That's fair.

22 Q. This is not an endurance contest. So if you  
23 need a break for any reason, just let me know. I would  
24 ask that if I've asked a question, that you answer the  
25 question and then take the break, as opposed to taking a

1 break while a question is pending. Fair enough?

2 A. Uh-huh. Yes.

3 Q. And I may take a break myself after about an  
4 hour just because I find that that can be helpful. You  
5 know, you get in a back and forth in the questioning.

6 What is your full name?

7 A. Wendell Holmes, Jr.

8 Q. And your date of birth?

9 A. 8/23/1978.

10 Q. Where were you born?

11 A. Philadelphia, Mississippi.

12 Q. You understand that you're under oath here  
13 today; correct?

14 A. Yes.

15 Q. Just like you're in court; correct?

16 A. Yes.

17 Q. You understand that part of that is you swore  
18 to tell the truth; correct?

19 A. Yes.

20 Q. Where do you currently live?

21 A. 5934 Rosie Lane.

22 Q. It's R-o-s-i-e, I think?

23 A. Yes.

24 Q. And what is the city?

25 A. Mableton.

1 Q. Georgia?

2 A. Yes.

3 Q. Is that Cobb County?

4 A. Yes.

5 Q. How long have you lived there?

6 A. A little over four years.

7 Q. Does anyone live at Rosie Lane with you?

8 A. Yes.

9 Q. Who?

10 A. My wife.

11 Q. What is her name?

12 A. Kia.

13 Q. How do you spell that?

14 A. K-i-a.

15 Q. Kia. Does she have a middle name?

16 A. Holmes.

17 Q. How long have you and Kia been married?

18 A. Seven years in May. I do have a question.

19 Q. Well, you don't really get to ask questions.

20 This is my chance to ask you questions. You get to

21 answer them or not.

22 A. I understand, but you're asking me questions

23 that I'm just wondering how they're related to all of

24 this.

25 Q. Again, you don't get to ask questions.

1 A. So basically I can choose not to answer then.

2 Q. No. We can take it up with the judge. I'm  
3 asking you for basic background about who you are, where  
4 you live --

5 A. It's personal information. I don't understand  
6 how it ties to this case.

7 Q. I'm going to continue to ask my questions.  
8 And so when did you marry Kia?

9 A. Seven years ago.

10 Q. What day?

11 A. May 22nd.

12 Q. What year?

13 A. 19 -- 2018. I don't recall.

14 Q. May 22nd of 2018 you married Kia?

15 A. That's correct.

16 Q. Do y'all have any children together?

17 A. No.

18 Q. Is Kia your first marriage?

19 A. Yes.

20 Q. And you said you've lived at Rosie Lane for  
21 how long?

22 A. Four years.

23 Q. Okay. So you were -- you lived somewhere  
24 other than Rosie Lane during the time you were married  
25 to Kia?



1 A. Briefly.

2 Q. Tell me about that.

3 A. Tell you about what exactly?

4 Q. You and Kia -- well, you said you moved to  
5 Rosie Lane four years ago?

6 A. Yeah.

7 Q. Is that yes?

8 A. I said yes.

9 Q. You said that you've been married to Kia since  
10 2018, since May 22nd of 2018.

11 A. Okay.

12 Q. So I'm wanting to know where -- have you  
13 continuously lived with Kia for seven years, the entire  
14 marriage?

15 A. Yes. We lived in an apartment before.

16 Q. Okay. That was my question.

17 A. I don't know what you're asking, I mean,  
18 because I moved out during this whole situation. So I'm  
19 not sure exactly what are you getting at. So yeah. Be  
20 more specific with me.

21 Q. I'm being very specific. Before Rosie Lane,  
22 you lived with Kia; right?

23 A. Your question was not before Rosie Lane. You  
24 said during the time, have you lived anywhere else.  
25 That's what you asked me.

1 Q. We're going to be here a long time if you --

2 A. That's fine. I got nowhere to go.

3 Q. Let's not talk over each. If you'll just

4 relax and answer my questions. I'm just going to ask

5 questions. That's what a deposition is.

6 Before Rosie Lane -- you were married to Kia

7 prior to moving to Rosie Lane; correct?

8 A. Yes. I've been married seven years.

9 Q. Did you live with Kia anywhere prior to living

10 with Kia at Rosy Lane?

11 A. Yes. We were married seven years. We lived

12 in an apartment before we moved to Rosie Lane.

13 Q. What was that address at that apartment?

14 A. I don't remember the address. It was off of

15 Shallowford Road in --

16 Q. 2500 Shallowford Road, Apartment 8632,

17 Atlanta, Georgia?

18 A. Yes. That's it.

19 Q. So that's where you lived with Kia before

20 Rosie Lane?

21 A. Yes.

22 Q. Have you lived anywhere other than that

23 apartment on Shallowford with Kia during the time that

24 you've been married to Kia?

25 A. In that apartment, you asked?

1 Q. Please listen to my question. You live at  
2 Rosie Lane currently with Kia. You lived at an  
3 apartment on Shallowford Road with Kia prior to the  
4 Rosie Lane. During the time you've been married to Kia,  
5 have you lived at any other address with Kia?

6 A. Yes. We moved from one apartment to the one  
7 upstairs. The address, I don't recall.

8 Q. So you lived at two apartments at Shallowford?

9 A. Yes. In the same building.

10 Q. Okay. Other than the two apartments on  
11 Shallowford and Rosie Lane, have you lived anywhere else  
12 with Kia during the time you've been married to Kia?

13 A. We lived at another one up the street. I  
14 don't recall the name of it.

15 Q. Was that -- where did y'all get married?

16 A. Here in Atlanta.

17 Q. Did you live with Kia before the marriage at  
18 all?

19 A. Yes.

20 Q. How long before the marriage did you live with  
21 Kia?

22 A. I don't recall. We -- I don't recall.

23 Q. Okay. Was it like a year or like ten years?

24 A. No. It was probably three or four.

25 Q. Three or four years?

1 A. Probably. Somewhere.

2 Q. You said you're originally from Mississippi;  
3 correct?

4 A. Correct.

5 Q. When did you first move from Philadelphia,  
6 Mississippi?

7 A. 2001.

8 Q. So based on your age, did you graduate high  
9 school in Philadelphia --

10 A. I did.

11 Q. What high school did you go to?

12 A. Philadelphia High School.

13 Q. And you said you graduated what year?

14 A. '96.

15 Q. And after high school, what did you do?

16 A. I went to college.

17 Q. Where did you go to college?

18 A. East Central Community College.

19 Q. Where is East Central Community College  
20 located?

21 A. Decatur, Mississippi.

22 Q. Is that near Philadelphia?

23 A. Yes.

24 Q. And did you receive a degree or a certificate  
25 or anything from East --

1 A. Yes. I received --

2 Q. Again, please let me finish my question before  
3 you start your answer; okay? We're trying to make a  
4 clear transcript. Let me finish my question. I'll let  
5 you finish your answer. We've established that in the  
6 beginning; okay?

7 Did you graduate or get any sort of  
8 certificate from East Central Community College?

9 A. Yes.

10 Q. What was that?

11 A. A community college degree, associate's  
12 degree.

13 Q. You got an associate's from East Central  
14 Community College in what year?

15 A. I don't recall.

16 Q. Okay. I guess -- well, you left Philadelphia  
17 in 2001, you said; right?

18 A. Correct.

19 Q. Were you living at home while you were going  
20 to East Central Community College?

21 A. No. I was on campus.

22 Q. Okay. You said you got an associate's degree  
23 at some point?

24 A. That's correct.

25 Q. Do you know how many years approximately it

1 took you to get the associate's?

2 A. Two years.

3 Q. So that takes you up to '98 or '99; right?

4 A. Yes.

5 Q. And your associate's degree, what is that in?

6 A. Liberal arts.

7 Q. After you obtained that associate's degree, do

8 you have any other schooling, education, trade

9 certificates, anything past that associate's degree?

10 A. I went to school at University Southern

11 Mississippi right after community college.

12 Q. Okay. So you would had started at Southern

13 Miss in '98 or '99 right after you finished the

14 associate's degree?

15 A. Approximately.

16 Q. And did you obtain a degree or certificate or

17 anything else from Southern Miss?

18 A. No, I did not.

19 Q. What did you study while you were at Southern

20 Miss?

21 A. I changed majors a few times.

22 Q. When did you last take classes at Southern

23 Miss?

24 A. I don't recall. It's been a long time.

25 Q. Fair enough. Were you there more than a year?

1 A. Yes.

2 Q. More than two years?

3 A. Yes.

4 Q. All right. Did you -- you moved to -- you

5 left Mississippi -- we're talking about Philadelphia --

6 in 2001. So let's maybe backtrack on that. That seems

7 like it would have had some overlap when you were at

8 Southern Miss; right?

9 A. That wasn't your question. Your question was

10 when I left Mississippi. Those schools are still in

11 Mississippi. I left Mississippi in 2001, which was your

12 question, when I left Mississippi.

13 Q. And Southern Miss, that's in Hattiesburg,

14 isn't it?

15 A. Hattiesburg.

16 Q. Did you leave straight sort of from

17 Hattiesburg to move to Atlanta?

18 A. No, I did not.

19 Q. When you left Hattiesburg, where did you move?

20 A. St. Louis, Missouri.

21 Q. And what brought you to St. Louis?

22 A. I was a touring musician.

23 Q. What instrument?

24 A. I play multiple instruments.

25 Q. What instrument were you touring when you left

1 to go to Missouri?

2 A. Drums.

3 Q. How long were you in Missouri?

4 A. From 2001 until 2005. I moved to Atlanta in  
5 2005.

6 Q. During the time you were in Mississippi, you  
7 worked as a professional musician?

8 A. In Mississippi?

9 Q. During the time you were in Missouri from 2001  
10 to 2005?

11 A. Oh, yes. And I was also a substitute teacher  
12 full-time.

13 Q. Okay. When you moved to Atlanta in 2005, what  
14 brought you here?

15 A. I wanted to live here.

16 Q. When you moved to Atlanta, what part of town  
17 did you move to?

18 A. Sandy Springs.

19 Q. And were you still working as a musician at  
20 that time?

21 A. Yes.

22 Q. You currently work as a musician?

23 A. I've always worked as a musician.

24 Q. So in your adult life, other than, like,  
25 substitute teaching and things like that, you've always



1 been a professional musician?

2 A. Always been a professional musician.

3 Q. We talked about Southern Miss where -- you got  
4 your associate's from East Central and then you were  
5 working on your bachelor's at Southern Miss, but didn't  
6 complete it.

7 Do you have any education, certificates,  
8 training, anything beyond Southern Miss?

9 A. No.

10 Q. I asked you before if you have ever been  
11 deposed, but this question is kind of different. Have  
12 you ever been involved in a lawsuit prior to this  
13 lawsuit?

14 A. No.

15 Q. First time you've ever been sued?

16 A. Yes.

17 Q. Never sued anybody?

18 A. No.

19 Q. Have you ever been arrested?

20 A. Yes. For suspended license.

21 Q. About approximately when was that?

22 A. It was years ago. It don't recall what year.  
23 But I got out immediately. It was an error, a clerical  
24 error. I never should have been arrested.

25 Q. And that was here in metro Atlanta?

1 A. That was here in Cobb County, but the ticket I  
2 had got was in Kentucky. And the ticket was paid. They  
3 didn't get it -- they didn't enter it into the system  
4 and when I got pulled over for speeding, I got arrested.  
5 I got out the same day because it was a clerical error.

6 Q. Okay. Other than that, no arrests?

7 A. I don't recall any arrests.

8 Q. Okay. Have you ever filed bankruptcy?

9 A. No.

10 Q. At the Rosie Lane address, does anyone other  
11 than Kia reside with you there?

12 A. Yes. Our dog.

13 Q. Her dog?

14 A. Our dog.

15 Q. Your dog. Okay. I was asking about human  
16 beings. Any other human beings --

17 A. No human beings.

18 Q. Okay. During the time that you lived at Rosie  
19 Lane, has any other human being resided with you and Kia  
20 there?

21 A. No.

22 Q. Does Kia have any children?

23 A. No.

24 Q. What is your telephone number?

25 A. (404) 664-2943.

1 Q. Who is your cell phone provider?

2 A. T-Mobile.

3 Q. How long have you had that cell phone number?

4 A. I don't recall the amount of years, but it's  
5 been a long time. Always had this number.

6 Q. Fair enough. And has T-Mobile been your  
7 provider continuously?

8 A. It was Sprint. It's now T-Mobile.

9 Q. When Sprint and T-Mobile sort of merged  
10 together, you became a T-Mobile customer?

11 A. Yes.

12 Q. All right. Do you have any social media  
13 accounts currently?

14 A. Yes.

15 Q. Okay. Tell me about those.

16 A. Facebook, Instagram, TikTok.

17 MR. WEEKS: All right. Facebook, I think  
18 there is some Facebook information in this case.  
19 And I believe I found you on Facebook. I'll go  
20 ahead and mark this as 1.

21 (Plaintiff's Exhibit 1 was marked.)

22 BY MR. WEEKS:

23 Q. This something that I found that has a guy  
24 with some drums and it's Wendelldrum --  
25 facebook.com\wendelldrum. Is that your Facebook?

1 A. Yes.

2 Q. Do you currently have any other Facebook  
3 accounts other than this one?

4 A. I believe I do. I'm a musician. I have  
5 multiple Facebook accounts. Music page, band page.

6 Q. You have a music page and a band page?

7 A. They are probably the same. I'm not sure.

8 Q. How about, like, individual? I know some  
9 people have more than one Facebook account. I have  
10 friends like that. Do you have --

11 A. I think I may have another one that's out  
12 there that I don't use. I mean, I don't really use any  
13 of them, to be honest, but --

14 Q. But the Wendelldrum, that would be your  
15 primary Facebook account?

16 A. I don't know if that's the -- everything is  
17 under Wendell Holmes, Jr. So I don't know if it's  
18 Wendelldrum or not. It could be. That may be my band  
19 page. I'm not sure.

20 Q. I looked for you on Instagram, but wasn't able  
21 to find you. What's the username on Instagram?

22 A. Everything is under my name.

23 Q. So if I put Wendell Holmes, Jr., in Instagram,  
24 I should be able to find your Instagram page?

25 A. Everything is under Wendell Holmes, Jr.

1 Q. TikTok?

2 A. Everything is under Wendell Holmes, Jr.

3 Q. Okay. So if I -- you said you have a TikTok  
4 account and that username is Wendell Holmes, Jr.?

5 A. Yes. Everything is under Wendell Holmes, Jr.  
6 You can type Wendell Holmes, Jr., in any social media  
7 account and I come up. I don't go under any other  
8 names.

9 Q. Okay. And that was my next question. We  
10 already talked about Facebook where you told me you got  
11 a music page and a band page. On Instagram, do you have  
12 any other Instagrams other than Wendell Holmes, Jr.?

13 A. Not that I know of. Not that I created.

14 Q. Under TikTok, do you have any other --

15 A. No.

16 Q. Let me finish my question, please. Do you  
17 have any other accounts other than Wendell Holmes, Jr.?

18 A. No.

19 Q. Do you have any dating apps?

20 A. No.

21 Q. Have you ever had any dating apps?

22 A. Yes.

23 Q. Let's talk about those. What dating apps have  
24 you had?

25 A. Tinder at one time. I think Bumble. That's

1 it that I can recall.

2 Q. Okay. You don't currently have a Tinder  
3 account?

4 A. No, I do not.

5 Q. And you currently don't have a Bumble account?

6 A. Do not.

7 Q. When did you last have a Tinder account?

8 A. I do not recall.

9 Q. When did you last have a Bumble account?

10 A. I do not recall.

11 Q. You've used Tinder and Bumble during the time  
12 you've been married to Kia; correct?

13 A. Yes, I believe so.

14 Q. So you have used Tinder or Bumble since 2018?

15 A. Bumble, I think so.

16 Q. Have you used Bumble in the last year?

17 A. No.

18 Q. Okay. Used bumble in the last two years?

19 A. I believe so.

20 Q. You met Natalie Soto on Bumble; correct?

21 A. I believe so.

22 Q. Can you tell me approximately when you met  
23 Natalie Soto on Bumble?

24 A. I believe it was September of 2023.

25 Q. Did you -- did you list yourself as single on

1 Bumble?

2 A. I don't recall. I don't believe I listed  
3 anything. I didn't have much information on there about  
4 me.

5 Q. All right. Fair enough.

6 A. I don't even believe Bumble even has you list  
7 that.

8 Q. Okay. You don't believe that that was a  
9 requirement?

10 A. I don't recall, but I don't think that is. I  
11 know I didn't list anything.

12 Q. Okay. So if Ms. Soto said that you told her  
13 you were single, would she be mistaken?

14 A. That's not true.

15 Q. That's not true?

16 A. I told Natalie I was married. And she told me  
17 she was separated from her husband Jimmy at the time.

18 Q. Okay. Did you tell her you're separated from  
19 your wife?

20 A. I did.

21 Q. And were you separated from your wife?

22 A. Yes. Legally, no. We still lived in the same  
23 house, but we were going through having issues at the  
24 moment. So yes.

25 Q. Okay. So you believe you met Natalie on

1 Bumble around September of 2023?

2 A. Yes.

3 Q. How long did you talk on the app before you  
4 met each other?

5 A. It was quick, man. It was not long at all.

6 Maybe -- I don't recall the exact answer, but it wasn't  
7 long at all. I'll give it a couple of days before we  
8 actually met.

9 Q. Okay. And did you go on a date or do you get  
10 Netflix and chill? What do you do when you first meet?

11 A. Actually, she asked me to come over to her  
12 apartment.

13 Q. And where was her apartment located?

14 A. I can look for the answer. I don't know the  
15 answer off the top of my head.

16 Q. Like can you give me a sense of sort of where  
17 in the metro area?

18 A. It's 75 going towards Cartersville. I just  
19 don't recall the name of the little town. It's a --  
20 some type of building off to the right. She lives on  
21 the other side of that. I don't recall.

22 Q. So that's north of where you live?

23 A. Yes.

24 Q. Okay. Somewhere up 75?

25 A. Yes.



1 Q. Do you remember about long it took you -- did  
2 you drive there or did she --

3 A. Yes. I always drove there.

4 Q. Okay. I didn't know because there was a  
5 discussion about y'all only having one vehicle with the  
6 judge. Do you currently have one vehicle or two or  
7 what's --

8 A. One is down.

9 Q. Okay. At that point, y'all had two vehicles?

10 A. Yes.

11 Q. And so you would drive -- well, first time --

12 A. My truck. I always drove my truck, my Nissan  
13 Xterra, 2008, silver.

14 Q. And at least according to Natalie, her  
15 relationship with you ended around January 1st, 2024, so  
16 around New Year's day of 2024. Would you agree or  
17 disagree with that?

18 A. I disagree. I believe the last time I saw her  
19 and we -- the last time we actually really talked, I  
20 believe, was the week of Christmas or leading up to the  
21 week of Christmas, because the last time I saw her she  
22 gave me a bottle of cologne and something else. I don't  
23 recall what the other gift was, but a couple of gifts  
24 she gave me, which was the week leading up to Christmas.

25 I believe Christmas was the top of week that

1 month -- that year. So that was the last time I saw her  
2 and I believe the last week we actually talked.

3 Q. Okay. Fair enough. So the holiday season of  
4 2023 was the end of your relationship; fair enough?

5 A. Yes.

6 Q. So we're just talking about a period from --  
7 pretty short period from September of '23 to --

8 A. Yeah.

9 Q. -- the holiday season of 2023; correct?

10 A. Yes, very short.

11 Q. Were you and Natalie ever intimate?

12 A. Yes.

13 Q. How many times?

14 A. I don't recall exactly how many times. But if  
15 I had to guess, maybe three.

16 Q. Okay. When you would hang out with Natalie,  
17 was it always at her place?

18 A. It was always at her place with the exception  
19 of one time we went to Marietta Seafood Market, if I  
20 recall correctly.

21 Q. So like a dinner date?

22 A. Yes.

23 Q. Y'all went for dinner. And then from that  
24 point, did you go back to her place, or did you go home  
25 and she went back to her place?

1 A. That I don't recall. It has been so long ago.

2 It's a year and a half ago.

3 Q. Okay. Fair enough. All right. At any point

4 did you ask Natalie to loan you money?

5 A. I did. Well, I don't recall if I asked her to

6 loan me money, but I mentioned to her that I was having

7 issues with my truck. And she mentioned that she wanted

8 to make sure I had transportation because she wanted to

9 see me and she wanted to make sure I can get around.

10 And at the time also I was preparing to have

11 surgery, and she wanted to make sure I can get to my

12 doctor's appointments. So she volunteered to give me

13 money to get my truck fixed, in a nutshell.

14 Q. Natalie says she loaned you a total of \$1900

15 to fix your car and for drum and music equipment. Is

16 that accurate?

17 A. That's not accurate.

18 Q. Okay. Do you think it's more or less than

19 that?

20 A. Way less.

21 Q. Can you give me an estimate of what you think

22 it is?

23 A. The question -- restate the question. Was the

24 question that she loaned me money? I want to make sure

25 I got the question --

1 Q. Did she ever give you money?

2 A. Yes. She gave me money.

3 Q. So there's times she gave you money and

4 there's times she loaned you money?

5 A. There's times she gave me money.

6 Q. Okay.

7 A. She never loaned me money. She gave me money.

8 Q. So your opinion or your belief is that any

9 money she gave you was a gift and not a loan?

10 A. It was because I didn't ask for a loan. I

11 didn't -- we didn't come to an agreement of me paying

12 her back.

13 Q. Okay.

14 A. It was her wanting to help. She was very

15 generous. I will say that much.

16 Q. You never promised to pay her back?

17 A. I did tell her I would pay her back because

18 that's what I wanted to do. It wasn't -- I don't

19 believe we had an agreement that I would pay her back.

20 But when I tried to pay her back, she told me

21 no. You're having surgery, you're not working right

22 now, don't worry about it.

23 Q. So your testimony is that she gave you gifts

24 that you then tried to repay, but she refused to accept

25 the repayment?

1 A. Well, I never said I tried to repay gifts. I  
2 tried to repay the \$900 she gave me that I asked could I  
3 give it back to her for fixing action my truck. Which,  
4 technically, you can look at it as a loan because I told  
5 her I would repay her back.

6 Q. Right. That was going to be my next question.  
7 There was an expectation of repayment --

8 A. It wasn't -- I don't believe it was on her  
9 end, but it was on my end. I told her, I agree that I  
10 will repay you this money back.

11 Q. And your testimony is that you offered to, but  
12 she refused you?

13 A. I did.

14 Q. And she refused?

15 A. She refused.

16 Q. All right.

17 A. Can I go -- can I make a statement that you  
18 kind of skipped over when we first met, if you don't  
19 mind, leading up to the whole money thing.

20 Q. Well, so here's the deal. If you need to  
21 explain an answer, you can tell me more. But this is  
22 sort of -- if it's not a direct answer to one of my  
23 questions, then no.

24 A. Okay. You're just leaving a lot of  
25 information --

1 Q. Okay. Tell me. Tell me what you want to tell  
2 me.

3 A. Well, when you asked about us meeting the  
4 first time, I went to her house. I was telling -- we  
5 was having a conversation while I was there about things  
6 I had going on. I had to go to Nashville, take a trip  
7 to Nashville. I believe it was the following week.  
8 Don't quote me exactly on the date. I think it was the  
9 following week or two weeks later.

10 At the time she had two Range Rovers. One, I  
11 believe, belonged to her ex-husband Jimmy, a white one.  
12 And another one that I believe belonged to her, which  
13 was a Range Rover Sport.

14 She offered -- since I was having issues with  
15 my truck, she offered to loan me one of her Range Rovers  
16 to drive to Nashville.

17 Not only did she offer to loan me the Ranger  
18 Rover, she said, Take my credit card and use it -- I  
19 paid to get -- I've already paid to get it cleaned up  
20 for you or I'm going to pay to get it cleaned up for  
21 you. Take my credit card, take the truck, take care of  
22 the gas, whatever you need to do and bring the truck  
23 back. And that's -- so --

24 Q. You took her up on that?

25 A. I did.

1 Q. So you drove the Range Rover to Nashville and  
2 back?

3 A. Yes.

4 Q. Okay. And on the credit card, did you use  
5 that for gas?

6 A. I used it for gas and food because that's what  
7 she told me to use it for.

8 Q. Did she say anything about repaying her for  
9 the charges on the credit card?

10 A. No, sir. As a matter of fact, she allowed me  
11 to hold on to the card for probably a month even after I  
12 tried to give it back to her when I returned the truck.

13 Q. Okay.

14 THE COURT REPORTER: Let me remind y'all this  
15 is not just a normal conversation.

16 MR. WEEKS: Yes, ma'am.

17 THE COURT REPORTER: And the reason he's  
18 asking you to wait until he finishes his question,  
19 it's for my benefit.

20 THE WITNESS: Got you.

21 THE COURT REPORTER: Okay. Thank y'all.

22 Q (By Mr. Weeks) I'm not trying to be rude with  
23 anything with the "is that a yes". All that is just to  
24 get us a clear transcript because at some point we may  
25 need to use this if this thing proceeds and we want it

1 to be as clear and accurate as possible.

2 A. Yeah. May I make one quick statement? So,  
3 again, I've never been in this situation before. I  
4 don't know how this works. My thing is I just want to  
5 make sure -- if we're getting details, I just feel like  
6 it's kind of one-sided.

7 So the reason why -- I didn't know if I was  
8 going to be given a chance to tell my side of the story  
9 because it seems like everything is just based off  
10 everything she said. So if --

11 Q. Well, I'm her lawyer and this my chance to  
12 take your deposition. I'm not trying to trick you or  
13 mislead you or anything. There are certain things that  
14 I want to ask about for Ms. Soto's case.

15 So this is my opportunity to ask you questions  
16 under oath. So it's -- it's not a trial. And I can't  
17 give you legal advice either about -- you know, I'm not  
18 your lawyer.

19 A. Yeah. I'm not asking that. But if my lawyer  
20 was sitting here, would he not be able to ask questions  
21 or ask her questions, because I was thinking she was  
22 going to be here.

23 Q. Now you're asking me legal questions. I can't  
24 advise you about what a lawyer would do or not --

25 A. Because I'm representing myself. That why I'm



1 asking.

2 Q. Correct.

3 A. Which means if I'm representing myself, if my  
4 attorney was here and he was able to ask questions, I  
5 should be able to ask question as my own representative.

6 Q. Tell you what. If you want to at the end,  
7 anything you want to put on this record, feel free to.

8 Typically -- you're correct. If there was a  
9 lawyer here with you, at the end they could ask you --  
10 once my questions are done. So typically I get to ask  
11 all my questions and then your lawyer would get to ask  
12 any questions that they wanted to ask of you.

13 So if you want to put some stuff on the record  
14 at the end, I'm fine with that; okay?

15 A. Okay.

16 Q. At some point during your relationship with  
17 Ms. Soto, did she send you pictures of herself?

18 A. Yes.

19 Q. Did she send those via text message?

20 A. I believe so. Yes.

21 Q. Did she send any through the Bumble app?

22 A. That, I don't recall at all.

23 Q. Do you use any other messaging app, like  
24 WhatsApp or anything like that?

25 A. Yes, I do.

1 Q. Did you ever use WhatsApp with Ms. Soto?

2 A. I don't recall.

3 Q. How about Snapchat? Did you ever Snapchat  
4 with Natalie?

5 A. I don't have a SnapChat. I'm not on SnapChap.

6 Q. As far as you know, the only electronic  
7 communication you would have had with Ms. Soto was on  
8 Bumble initially and then via text message once you  
9 exchanged numbers?

10 A. Yes.

11 Q. And did you talk on the phone in addition to  
12 texting?

13 A. At any time or --

14 Q. Yeah.

15 A. We very rarely talked on the phone. Most of  
16 our conversations were in person when I did see her or  
17 through text messages. I'm -- me and my wife lived  
18 together. So I couldn't be talking to her on the phone.

19 Q. Did your wife know that you were talking to  
20 Natalie?

21 A. No. I didn't discuss that with her.

22 Q. I guess she knows now?

23 A. Oh, she definitely knows now.

24 Q. All right. You said Natalie sent you some  
25 photos at some point. Can you give me an idea of how

1 many?

2 A. Probably, if I had to guess, three off the top  
3 of my head that I can remember. It could have been  
4 more. I just know of three particular ones.

5 Q. All right. Did you ever send any photos of  
6 yourself to Natalie?

7 A. I don't recall ever sending any photo to her.

8 Q. And those photos of Natalie, I've seen at  
9 least two of them that show her exposed breasts. Would  
10 you agree with that?

11 A. You said you've seen two?

12 Q. Yes.

13 A. Yes. She did send me a couple of photos that  
14 exposed her breasts.

15 Q. You had at least two photos of Natalie of her  
16 exposed breasts?

17 A. Yes.

18 Q. And that showed her nipple and aureola?

19 A. I believe one did, yes. The other one, I  
20 believe, her hair was covering up.

21 Q. Got you. So Natalie has told me that at some  
22 point she was suspicious because she had never been to  
23 your house, instead you were always going to her house.

24 A. Correct.

25 Q. So she said she then looked you up online and

1 saw a picture of you with another woman which was your  
2 wife. And she asked you about it and you said -- told  
3 her that that was just a good friend. Do you agree or  
4 disagree with that?

5 A. I totally disagree.

6 Q. Do you recall Ms. Soto ever asking you about a  
7 photo of you and your wife that she found on social  
8 media?

9 A. Yes, I do.

10 Q. Okay. Tell me about that.

11 A. I just recall her saying she looked me up on  
12 social media. This was early on. This is September,  
13 late September, right after we met. She looked me up,  
14 and her statement was basically if you're separated, why  
15 are there current photos of you and your wife.

16 I said, Because she's my wife. We're still  
17 married. We still celebrate family -- our families are  
18 close. That was my answer.

19 Q. So you never told her that that was just a  
20 good friend?

21 A. Never. Because I can't deny it. It's all  
22 over the internet.

23 Q. All right. And you said the relationship  
24 ended around the holiday season of 2023; correct?

25 A. Yes.

1 Q. Tell me about that.

2 A. It's really not much to say other than I saw  
3 her the week before Christmas, gave me a couple of  
4 gifts. She basically said I'm tired of not being able  
5 to spend holidays with you because you're with your wife  
6 and family.

7 And that was the last I heard from her until  
8 March -- I mean February. Yeah, February. That's the  
9 last we talked.

10 Q. So you did talk her again in February?

11 A. Yes.

12 Q. And March?

13 A. Yes. No. Yes. February.

14 MR. WEEKS: I'll hand you what I'm going to  
15 mark as Exhibit 2.

16 (Plaintiff's Exhibit 2 was marked.)

17 BY MR. WEEKS:

18 Q. Have you ever seen this post before?

19 A. I definitely have.

20 Q. And this is -- at the top, it's a group -- or,  
21 I guess, a group on Facebook. Would you agree it's a  
22 group?

23 A. Yes. A large group.

24 Q. A group, Are we dating the same guy,  
25 Atlanta/Athens/Marietta/Georgia. You see that?

1 A. Yes.

2 Q. Atlanta/Athens/Marietta/Georgia. And it looks  
3 like Natalie posted, If you come across him, run. Do  
4 you see that?

5 A. Yes.

6 Q. And there were people who had commented  
7 underneath this image; correct?

8 A. Yes.

9 Q. How did you first become aware that Natalie  
10 had posted -- this is a picture of you; right?

11 A. It is.

12 Q. How did you first become aware that Natalie  
13 had posted a picture of you on the Are we Dating The  
14 Same Guy group on Facebook?

15 A. From my recollection, my sister-in-law, who  
16 was contacted by Natalie about me, my sister-in-law  
17 anonymously contacted my wife, told her about this while  
18 she was at work. So my wife contacted me and told me  
19 about this. So I found out through my wife.

20 Q. I imagine she wasn't happy?

21 A. She wasn't happy at all.

22 Q. This photo here, was this -- was this from  
23 Bumble or something? Or do you know where she --

24 A. I believe it had to have been from Bumble.

25 Q. This is a photo that you used on your Bumble

1 profile?

2 A. Yes.

3 (Plaintiff's Exhibit 3 was marked.)

4 BY MR. WEEKS:

5 Q. This is 3. This is another -- this was posted  
6 underneath the Are We Dating The Same Guy post; right?

7 A. Yes.

8 Q. And this is a post from Natalie; right?

9 A. Yes.

10 Q. And Natalie says, If you come across this man  
11 Wendell on a dating site, run. He is still married. He  
12 will try to convince you otherwise. They live together.  
13 He owes me money that is refusing to pay me back from  
14 getting his truck fixed and for some of his drum  
15 equipment he wanted. He had every excuse in the book  
16 about why there are pictures of him and his wife  
17 together and why they spend holidays together, but they  
18 are supposedly not together.

19 I tried messaging his wife today to tell her  
20 to tell him to give me back my money, but I guess she  
21 think it's a joke lol, l-o-l, and won't message me back.  
22 So bottom line is run.

23 You see that?

24 A. (Witness nods head.)

25 Q. So is this -- when you got the call from your

1 wife who was contacted by, I guess, her sister about

2 this, is this what you saw?

3 A. Yes. This was sent to me.

4 Q. This was sent to you by your wife?

5 A. Yes.

6 Q. What did you think?

7 A. I lost my cool and my head.

8 Q. Okay. Why --

9 A. My wife was very angry. She was -- yeah --

10 ready -- yeah, risk it all.

11 (Court reporter requested clarification.)

12 THE WITNESS: She was ready to risk it all.

13 That's a saying that people use.

14 BY MR. WEEKS:

15 Q. All right. Natalie tells me that your

16 sister-in-law told her that she was well aware of your

17 philandering and had been for a while. Would you agree

18 or disagree with that?

19 A. I don't agree -- what part, her being aware?

20 Q. Your sister-in-law told Natalie that they were

21 aware that you had been philandering?

22 A. I'm aware of that comment, yes.

23 Q. Made by your sister-in-law to Natalie?

24 A. Yes.

25 Q. And she said that her and her other



1 sister-in-laws were going to confront you about that;

2 correct?

3 A. I never saw that part. I don't know if that's

4 true or not.

5 Q. Okay. All right.

6 A. I mean, these are messages between them. I'm

7 only getting what my wife gets.

8 Q. All right. Have you ever had any other phone

9 number other than -- in the last five years other than

10 the one you gave me --

11 A. Yes.

12 Q. -- earlier? What other --

13 A. Yes.

14 Q. What other phone numbers have you had in the

15 last five years other than the one you gave me earlier?

16 A. I have a Google number.

17 Q. And what is that?

18 A. The number?

19 Q. Yes, sir.

20 A. I would have to look at my phone. I don't

21 know it by heart.

22 Q. Can you do that?

23 A. Sure. It's on one of these papers, I know for

24 sure. (201) 540-9457.

25 Q. And that is your Google voice number?

1 A. Yes, sir.

2 Q. And you use that for business?

3 A. I use it for different things.

4 (Plaintiff's Exhibit 4 was marked.)

5 BY MR. WEEKS:

6 Q. All right. This is a text thread that Natalie  
7 provided to me that she received on February 22nd, 2024.

8 And at the top of this thread it has (201) 540-9457.

9 You see that?

10 A. Yes, sir.

11 Q. And you just told me that was your Google  
12 number?

13 A. It is.

14 Q. And the first text comes in at 1:24 p.m. on  
15 February 24th, 2024; correct?

16 A. Yes. That's what it says.

17 Q. And that is essentially a screenshot of what  
18 we just marked as Plaintiff's 3; correct?

19 A. Yeah.

20 Q. And so on this day, February 22nd, 2024, you  
21 sent that screenshot to Natalie?

22 A. Yes. I believe so.

23 Q. And then Natalie says, Who is this? I guess  
24 you have two phone lines. That's nice to know. You  
25 messed with the wrong person. Karma works in mysterious

1 ways. That's all I'm going to say.

2 You see that?

3 A. Yes, sir.

4 Q. And that's what Natalie said to you; correct?

5 A. Yes.

6 Q. And underneath that it says, All good. I

7 warned you time to play. Did you say that?

8 A. Yes.

9 Q. And that's what you told Natalie?

10 A. That's exactly what I told Natalie.

11 Q. And then the next thing you say on the second  
12 page there is, All good I warned you. Time to play your  
13 game better. You see that? Second page there.

14 A. Yeah.

15 Q. That's what you said to Natalie; right?

16 A. Yes.

17 Q. And in response, Natalie said, You're just mad  
18 because I busted up your little game so all these women  
19 that you've been playing for all these years and playing  
20 your wife who doesn't deserve what you do to her and I  
21 told you that so you can go do whatever the fuck you  
22 want. I don't give a fuck because you don't even know  
23 who the fuck I am so go ahead and try me.

24 See that?

25 A. Of course I see it.

1 Q. That's what Natalie said to you?

2 A. Yes, sir.

3 Q. And then Natalie said, And your wife deserves  
4 so much better than what you do to her so you're just  
5 mad because you got caught.

6 That's what Natalie said to you; correct?

7 A. What Natalie said to me.

8 Q. And then she says, For someone who votes  
9 themselves -- I think she might have meant "devotes",  
10 but somebody who votes themselves to the Lord, you sure  
11 are manipulator you're a user and you think you're like  
12 the best thing ever when the man upstairs, the one you  
13 have to answer to not to me not anybody else with the  
14 man upstairs when it's your time, so I don't know how  
15 you can go and sit in church being the way that you are.

16 See that?

17 A. Yes, sir.

18 Q. That's what Natalie said that to you; correct?

19 A. Yes.

20 Q. And in response you said, Don't forget to lock  
21 your doors, poo emoji; correct? You said that to  
22 Natalie; correct?

23 A. Yes, sir.

24 Q. And then you said, Not mad at all, I get even.  
25 I can play better.

1 That's what you said to Natalie; right?

2 A. That's what I said to Natalie.

3 Q. And then Natalie said, Don't you have the  
4 first find me first and I haven't even been staying at  
5 my new house, so good luck on that one. And your  
6 threats don't even scare me, so good luck on that one  
7 you're just mad and being petty.

8 That's what Natalie said; correct?

9 A. Correct.

10 Q. And the next thing that you said is, You are a  
11 dumb bit bitch. You knew I was married. You look  
12 stupid but you knew you were slow and stupid. My wife  
13 can't believe I would even talk to someone as ugly as  
14 you, lol, and she's right. You really a trailer park  
15 trash hoe. You and your daughter.

16 You said that; correct?

17 A. I did.

18 Q. Oh trust I can find you, lol.

19 You said that; correct?

20 A. L-o-l.

21 Q. That's "laugh out loud"; correct?

22 A. Yes.

23 Q. You said that? You're telling Natalie you  
24 could find her; correct?

25 A. Yes.

1 Q. Then you said, You got til noon to delete  
2 everything you posted about me on this Facebook group  
3 before I make your life a living hell and really expose  
4 you. You out here looking like boo boo the fool for  
5 giving me cash for -- okay. This continues on to the  
6 next page. You see that?

7 A. I'm here.

8 Q. Okay. You're ahead of me. You look like boo  
9 boo the fool for giving me cash for my truck e-t-c  
10 knowing I'm married. You and your daughter are both  
11 really stupid slow ass chicks. You think this makes me  
12 look bad and people sorry for you.

13 Do you see that?

14 A. I do see it.

15 Q. That's what you said; correct?

16 A. That's what I said.

17 Q. And Natalie said, Just so you know, your words  
18 don't hurt me and no, I did not know you were married  
19 until I found out myself and you said you weren't even  
20 sleeping with her nothing so give me a fucking break  
21 you're the liar you're the cheater you're the adult  
22 that's the number one center at God's eyes so go ahead  
23 you're going to have to speak your mind to God not to me  
24 to God so go blow your bullshit to somebody else because  
25 your fucking words don't hurt me I don't give a fuck

1 about you nothing.

2 That's what Natalie said; right?

3 A. That's what she said.

4 Q. And then you said, Sorry ass stripper pole  
5 videos, they suck, you suck, you really should go get a  
6 job stripping. You wouldn't make much cash though. You  
7 really out here looking like a clown emoji on Facebook  
8 thinking you saving the world. Like I'm so mad I even  
9 gave a dumb bitch like you my number. You really are  
10 mentally slow.

11 You said that?

12 A. I did.

13 Q. Your words don't hurt me lol. Go enjoy life  
14 in that ugly ass shack house with your funky ugly dog.

15 You said that; correct?

16 A. Yes.

17 Q. Since you want to look like a victim, we're  
18 going to make sure these receipts get out there to  
19 everybody.

20 You said that; correct?

21 A. I did.

22 Q. And then Natalie says, No. It's called you  
23 owe me money and I think everybody needs to know exactly  
24 who you are and what a liar you are and how you use  
25 people and how you want them to be dumb thinking that oh

1 you're single and you don't sleep with your wife and you  
2 live by yourself, blah, blah, blah, so go fuck off,  
3 Wendell.

4 That's what Natalie said; correct?

5 A. That's what she said.

6 Q. And then she said, But you'll never be able to  
7 pay me back because your wife obviously supports you, so  
8 that's it and all the little bitches you fuck around  
9 with.

10 That's what Natalie said; correct?

11 A. Yeah.

12 Q. And you said back to her, Natalie you ain't  
13 getting a dime from me. Go to hell. And you are a  
14 dummy.

15 That's what you said; right?

16 A. That's what I said you.

17 Q. And then you said, So all of this is  
18 pointless. You wasting time energy and you looking like  
19 a fool and you still won't get a dime from me. So have  
20 accomplished absolutely nothing, zero, nada, laughing  
21 crying emoji; correct?

22 A. Yes.

23 Q. And that's what you said; correct?

24 A. Yes.

25 Q. And next you said, Maybe I'll post some of



1 your nude photos on that same chat, dot, dot, dot then

2 we will see how you look to all these women.

3 You said that; correct?

4 A. I did.

5 Q. You said that on February 22nd, 2024; correct?

6 A. Correct.

7 Q. Then you said, And I got all the receipts. I

8 didn't delete my messages boo.

9 You said that to Natalie; correct?

10 A. Uh-huh.

11 Q. Yes?

12 A. Yes.

13 Q. You still want to go on this vacation with

14 you, laughing emoji, oh I got some even better ideas.

15 You said all that; correct?

16 A. I did.

17 Q. All right.

18 A. That's it?

19 Q. Those are the ones I had questions about for

20 right now. This is February 22nd, 2024.

21 Natalie tells me that she received a message

22 from a woman named Dawn Douglas that she did not know on

23 Friday, February 23rd, 2024. So do you know somebody

24 named Dawn Douglas?

25 A. No, I don't know Dawn.

1 Q. Never met her?

2 A. Never met her.

3 Q. Dawn had made a post on -- a public post on  
4 the If You See This Man Run Facebook we looked at  
5 earlier; correct?

6 A. Correct.

7 Q. And you had texted Dawn on Instagram, Facebook  
8 and text message after she made that post on the public  
9 group Are We Dating The Same Man; correct?

10 A. One, I don't have her number.

11 Q. Okay.

12 A. And, two, no. I didn't message her.

13 Q. You never messaged Dawn Douglas?

14 A. No.

15 (Plaintiff's Exhibit 5 was marked.)

16 BY MR. WEEKS:

17 Q. I'll hand you under this. It's redacted  
18 through the breast. All right. So this says Wendell  
19 Holmes, Jr., at the top; right?

20 A. It does.

21 Q. And you sent a message that says, So it's  
22 stupid that these pages don't allow the man to come on  
23 and have a say so, dot, dot, but it's all good. I don't  
24 have to answer to any of you. Just be careful with this  
25 shit, it may not be as cool and fun full of games as you

1 may think, dot, dot, oh, I got plenty of receipts, dot,

2 dot, dot.

3 You see that?

4 A. I do.

5 Q. And that's what you said; correct?

6 A. I didn't say this.

7 Q. You did not say this?

8 A. I didn't send this.

9 Q. You did not send this. Okay. And underneath  
10 there, there are five photos. You see that?

11 A. Yeah.

12 Q. And do you recognize any of these photos?

13 A. I recognize two of them.

14 Q. Which ones do you recognize?

15 A. Natalie, the last two.

16 Q. The third one on the right on the top and  
17 first one on the bottom row on the left are both of  
18 Natalie; correct?

19 A. Yes.

20 Q. Those are pictures that Natalie had sent you  
21 during the time y'all were talking?

22 A. Yes.

23 Q. You sent them out to this group; correct?

24 A. No.

25 Q. You sent these out to Dawn Douglas?

1 A. No.

2 Q. What's your explanation for this then?

3 A. We got time to go through the explanation? I

4 mean, she's typing all this so -- I got a long

5 explanation.

6 Q. Okay. That was my -- answer my question.

7 What is your explanation for your name being --

8 A. My explanation is anybody could have created

9 this and sent this. That's my explanation. I didn't

10 send this.

11 Q. Okay.

12 A. And also my explanation for my social media is

13 multiple people, including Natalie, has access to my

14 social media because she knows my login. Me and Natalie

15 got very close, very personal. She knows my login. My

16 wife knows my login. My sister-in-law knows my login.

17 And there is no telling who else, because the only thing

18 I post on social media is basically about music. So I

19 have nothing to hide on social media or keep secret. My

20 pages are open.

21 Q. Well, you admitted the day before you told

22 Natalie maybe I'll post some of your nude photos on that

23 same chat, then we'll see how you look to all these

24 women; correct?

25 A. I did make that statement. This is not the

1 same chat. This looks like a personal message. This is  
2 not a chat.

3 Q. I understand. In the chat with Natalie you  
4 threatened her the day before to post her nudes;  
5 correct?

6 A. I made a lot of statements in the heated  
7 exchange. We both made threats towards each other. I  
8 would never act on those threats. I was angry at the  
9 time.

10 Q. So you admit that you threatened to post  
11 Natalie's nudes on the same chat; correct?

12 A. On the same chat Are We Dating The Same Man.  
13 But here's the key. Men can't get on that site. So  
14 only a female could post it on there.

15 Q. This says Wendell Holmes, Jr., at the top,  
16 though; correct?

17 A. We're talking the chat right now, the group  
18 chat, we're talking about. In the message that you're  
19 referring to with Natalie, we've talked me posting on  
20 the group chat Are We Dating The Same Man. I can't  
21 get -- no man can get access to that chat.

22 Q. But you threatened to post her nudes on that  
23 chat?

24 A. I did. But I can't get in it. So it was  
25 basically a lie threat to get her to take the post down.

1 Q. Okay. And you told her she had until noon on  
2 February 23rd to delete everything before you made her  
3 life a living hell and you exposed her. We already  
4 talked about that; right?

5 A. We did. Again, it was in that same heated  
6 argument. No intent to act on it.

7 Q. So if Ms. Dawn said she received this from  
8 you, she's lying?

9 A. I don't know if she -- I don't -- she didn't  
10 receive it from me personally. So yes, she would be  
11 lying.

12 Q. She received it from your Facebook account?

13 A. Yes. She's lying.

14 Q. Dawn is lying about receiving this  
15 message that we're looking at here --

16 A. From me.

17 Q. Let me --

18 THE COURT REPORTER: One at a time, please.

19 Q (By Mr. Weeks) Dawn is lying about receiving  
20 what we've marked as Plaintiff's 5 from your Facebook  
21 account?

22 A. I don't have the answer to that. I didn't  
23 send it. That's the answer.

24 Q. Who sent it then?

25 A. I have no idea.

1 Q. They're pictures of Natalie; right?

2 A. They are.

3 Q. And you said you think Natalie sent these from  
4 her cell to --

5 A. Natalie, I don't put nothing past this young  
6 lady.

7 Q. Do have any -- has she ever logged in to your  
8 Facebook before?

9 A. Yeah. She knows my passwords. They are all  
10 the same to all my social media.

11 Q. That wasn't my question. Do you know if  
12 Natalie has ever logged into your Facebook account?

13 A. I said yes.

14 Q. You believe that she has or you know that she  
15 has?

16 A. I know she has. I've been with her when she  
17 has.

18 Q. When did she last do that?

19 A. It was probably one of the days we were  
20 sitting around in her crib just chilling back in  
21 October.

22 Q. So in October when y'all were hanging out,  
23 she's logging into your Facebook account?

24 A. Yes.

25 Q. Why?

1 A. Because she wants to look at my Facebook  
2 account. First of all, she's trying to argue with me at  
3 that period of time that I'm -- I'm not -- if I'm seeing  
4 other chicks or whatever and if me and my wife are  
5 separated. So I'm like, You can look through my stuff  
6 yourself.

7 Q. So she looks through your phone on your  
8 Facebook account?

9 A. Yes.

10 Q. But she didn't actually --

11 A. She logged in, is what I'm saying.

12 Q. She logged into your Facebook account on her  
13 phone?

14 A. On my phone.

15 Q. So you weren't logged into your Facebook --

16 A. I wasn't logged in.

17 Q. Please let me finish my question. You keep  
18 interrupting me and I'm trying to be -- stay calm.

19 Natalie, you said, looked through your  
20 Facebook account. So you -- and I want to see how that  
21 happened. So she asked you about your Facebook and you  
22 hand her your phone?

23 A. Yeah.

24 Q. And I know, at least, on my phone I'm logged  
25 into Facebook. Were you are not logged into Facebook?



1 A. No, I was not. I don't even have the apps on  
2 my phone. You have to actually type in Facebook, go to  
3 it and log in at that time.

4 Q. Like through a web browser?

5 A. Web browser or the app will come up. I don't  
6 keep the apps on my phone.

7 Q. Well, if the app would come up, you would have  
8 to have the app installed in order for it to come up.

9 A. It's installed, but it's not -- you have a  
10 list of apps. Facebook, Instagram apps aren't on my  
11 pages. You have type it in in the search at the bottom.  
12 The app appears, you log in.

13 Q. You don't have a shortcut for the app, but the  
14 app is installed on your phone; correct?

15 A. Yes.

16 Q. Natalie then goes -- do you have an iPhone or  
17 an Android?

18 A. I have an iPhone.

19 Q. So she had to go to the App Store and type in  
20 Facebook in order to be able to open it?

21 A. That's not how I explained it. You go to the  
22 bottom -- I didn't say you go to the App Store. You go  
23 to the bottom of the search -- would you like me to  
24 demonstrate it?

25 Q. Sure.

1 A. If you go through here on my phone, there is  
2 no Facebook, Instagram. But you go here, if it don't  
3 pop up there, you can just type in Instagram.

4 Q. Type in Facebook.

5 A. (Witness complies.)

6 Q. All right. So when you do that, you don't  
7 have to type in a password; correct?

8 A. Now you don't. If I'm logged in, you don't.  
9 But if I'm not logged in, yes, you have to type it in.  
10 It depends on what I've been doing, if I'm logged in or  
11 not.

12 Q. So your testimony is in October Natalie took  
13 your phone --

14 A. She didn't take it. I gave it to her.

15 Q. You gave Natalie your phone and she did what  
16 you just did there and tapped Facebook; right?

17 A. (Witness nods head.)

18 Q. Is that a yes?

19 A. Yes.

20 Q. And at that point your testimony is that you  
21 did not have -- you were not logged into your Facebook  
22 account?

23 A. No.

24 Q. And what happened next? Did she ask you --

25 A. She said, What's the login?

1 Q. Try to wait, please. I'll try to do the same.

2 It's really bad for the transcript.

3 So you hand her your phone and she asked

4 you -- so she hit the Facebook -- it's just the login

5 page at that point?

6 A. Yes.

7 Q. Was your username populated?

8 A. What do you mean? I don't understand.

9 Q. In the login page for Facebook, was your

10 username listed there, your email address or your

11 username for Facebook?

12 A. I don't recall any of that. I just know you

13 have to put in the password because sometimes -- I

14 haven't done it in a while. Sometimes the email may be

15 listed there, but then you have to type in the -- it may

16 ask for the password.

17 Q. And that's what I'm getting at. Your

18 testimony is in October you had to put in a password;

19 right?

20 A. Yes.

21 Q. So when you handed her the phone and you

22 opened it up, were both username and password blank? Or

23 was it a thing with your photo and your username with

24 just a blank password thing and then you had to enter

25 the password?

1 A. I don't recall that. I just know she had to  
2 log in.

3 Q. You don't recall whether it was logged out,  
4 but you recall her having to log in?

5 A. I recall she needed my password because she  
6 asked me what was my password. That's what I recall.

7 Q. And so at that point, Natalie asked you what  
8 your password is?

9 A. Yes.

10 Q. And you told her?

11 A. Yes.

12 Q. And then she logged into your Facebook?

13 A. Yeah.

14 Q. I don't need to know your password, but is it  
15 something you think she could have remembered?

16 A. Yeah.

17 Q. Okay. You believe that Natalie has concocted  
18 this story against you?

19 A. I don't use -- I don't use hard passwords. I  
20 use very easy, like Drum1978.

21 Q. Don't tell me your password.

22 A. That's not my password. I'm giving you an  
23 example.

24 Q. So other than that, are you aware of Natalie  
25 ever logging into any of your accounts?

1 A. I don't know what she's done.

2 Q. That's my question. Are you aware of any?

3 A. I don't know.

4 Q. You're not aware?

5 A. No, I'm not aware.

6 Q. Thank you. So the only time you claim that

7 Natalie ever logged into any of your accounts was that

8 one time in October when she logged into your Facebook?

9 A. Yeah. I was sitting right there. Yes. That

10 I gave her permission to do it.

11 Q. How about without permission? You don't know

12 that Natalie's ever --

13 A. I wouldn't know --

14 Q. Let me finish my question.

15 A. Well, you tell me when you're finished next

16 time. Then I'll talk. So I don't have to guess.

17 Q. Sir, I was still actively talking. I was in

18 the middle of a sentence. And you've done this a lot.

19 In October, you're with Natalie and you claim

20 she wanted to look at your Facebook account; right?

21 Right?

22 A. Right.

23 Q. Okay. And at that point when she wanted to

24 look at your Facebook account -- we've already gone over

25 it -- you claim that you were not logged in; correct?

1 A. Correct.

2 Q. And you claim that Natalie had your phone and  
3 asked you for your password; correct?

4 A. Yes.

5 Q. And you claim that you gave your password to  
6 Natalie on that day in October and she logged into your  
7 account; correct?

8 A. Yes.

9 Q. My question is do you have any knowledge of  
10 Natalie ever logging into any account that belonged to  
11 you, being Facebook, being email, being anything else,  
12 other than the time you have told me about in October  
13 when she was next to you and you gave her your password?

14 A. I don't have any knowledge.

15 Q. Okay. So when you say it might have been  
16 Natalie, you're just speculating; correct?

17 A. Yes. All of this is speculation.

18 Q. But you don't dispute that someone from your  
19 account sent this to Dawn Douglas; correct?

20 A. I'm not -- I'm not saying whether I dispute  
21 anything because I don't know if that's actually my  
22 account. It's just my name at the top with a photo of  
23 me. So I don't know if that's my account or not.

24 Q. Well, you would have seen it on your account;  
25 correct?

1 A. I don't have that in my account. I haven't  
2 seen this in my account. So no.

3 Q. Okay. So if Dawn says she received this from  
4 your account, she is lying?

5 A. I don't know what Dawn is. I haven't talked  
6 to Dawn.

7 Q. Well, if it had been sent from your account in  
8 Facebook Messenger, it would have been in your Facebook  
9 Messenger's out message; correct?

10 A. I don't know. It's not in my Facebook  
11 Messenger.

12 Q. That's not my question. If it was sent from  
13 your account, it would be in your outbox on Facebook  
14 Messenger?

15 A. I don't know. That's my answer.

16 Q. You don't know if would be in your outbox on  
17 Facebook Messenger if you sent it from your Facebook  
18 account?

19 A. I didn't send it. So I don't know. I didn't  
20 sent it.

21 Q. You don't know if it would be in your outbox  
22 if it was sent from your Facebook account?

23 A. No, I don't know.

24 Q. When you send a message on Facebook Messenger  
25 or anyone sends a message on Facebook Messenger, it

1 remains in the outbox until it's deleted. Would you

2 agree or disagree with that?

3 A. Correct. When I send a message, yes.

4 Q. Okay. When anything is sent from your account

5 on Facebook in Facebook Messenger, it appears in an

6 outbox; correct?

7 A. Yes. If I send a message, it does appear.

8 You're trying to trick me. You're not going to trick

9 me, dude. I see what you're doing.

10 Q. Your account on Facebook, anything that is

11 sent from that account would be in the outbox of that

12 account. Would you agree or disagree with that?

13 A. Typically, yes, it is.

14 Q. And this, according to Dawn Douglas, was sent

15 from your account to her account; okay?

16 A. Okay.

17 Q. So this should have appeared in your outbox of

18 your account whether it was sent by you or someone else

19 accessing your account; correct?

20 A. If you say so.

21 Q. You don't disagree with that; correct? That's

22 the way technology works.

23 A. That's not in my account. That's all I know.

24 That's my answer. It's not in my account.

25 Q. You don't get to rewrite my question, Mr.



1 Holmes. Your account sent this message to Dawn Douglas?

2 A. I don't have any proof that my account sent  
3 it.

4 Q. Well, that's what I'm trying to figure out is  
5 what proof there is or isn't. Do you look through your  
6 Messenger?

7 A. I really don't.

8 Q. Can you look through it right now?

9 A. I tried to look for this because I saw this  
10 before that she sent it. It's not in my account. And  
11 I've said that ten times. It's not in my account. I  
12 don't know how many times I got to keep saying it.

13 Q. Your testimony is this was not sent from your  
14 account to Dawn Douglas?

15 A. My testimony is I didn't send anything to Dawn  
16 Douglas from my account. That's my testimony.

17 Q. That's not my question. It's your account and  
18 you have access to it.

19 A. I don't have any proof this is my account.  
20 You keep trying to make me say this is my account. I  
21 don't know if that's my account. I didn't send this.  
22 It's not in my account. So I can't tell you if I sent  
23 it. You're not going to make me say that.

24 Q. I'm not trying to make you say anything. I'm  
25 trying to get your testimony.

1           So -- and I get that you say you didn't send  
2 this. You've told me that. But do you know if your  
3 account sent this or not?

4           A. I don't know. I looked for the messages.  
5 They are not in my phone.

6           THE COURT REPORTER: When you get to a good  
7 spot.

8           MR. WEEKS: Okay. This is as good as any.  
9 We'll take a few-minute break. We've been going  
10 about an hour and 20 minutes.

11          Q (By Mr. Weeks) How long a break would you  
12 like?

13          A. I don't need a break.

14          Q. Well, sir, the court reporter would like a  
15 break.

16          A. I'm telling you I don't need a break. So  
17 however long she needs, that's how long we need.

18          MR. WEEKS: Thank you. Let's do about ten  
19 minutes.

20                   (Brief recess.)

21 BY MR. WEEKS:

22          Q. Mr. Holmes, you sent an email to the court a  
23 couple of days ago saying you needed a work excuse;  
24 correct?

25          A. Correct.

1 Q. Okay. And then Danielle Bird sent an email to  
2 me asking me to provide some documentation for you. Do  
3 you recall that?

4 A. Yes.

5 Q. And I sent you a copy of your notice of  
6 deposition; correct?

7 A. Correct.

8 Q. And in response, you said, I'm good. I didn't  
9 did ask for anything from you. Not sure why Danielle  
10 attached all of you on an email about this. I guess  
11 y'all all working together, shrug emoji, cool. Did you  
12 send that to myself and Danielle at the court?

13 A. I sure did.

14 Q. What did you mean by that?

15 A. Exactly what I said. Danielle works for the  
16 court. And if I'm asking her something from the courts,  
17 I'm not sure why she's including you guys because I  
18 didn't ask you guys. If I needed something from you or  
19 you guys, I would ask you guys. I sent her a specific  
20 email, just her.

21 Q. So the court is working with us against you?

22 A. Again, I just explained why I asked that or  
23 said that. I couldn't understand why she attached --  
24 you already sent me that information that you sent me.  
25 I couldn't understand why she attached all of y'all when

1 I didn't message all of y'all on the email. I sent her  
2 a direct message between me and her. So it was private,  
3 personal.

4 Q. Do you think Danielle and the U.S. District  
5 Court is working and conspiring with me to come after  
6 you? Is that what you're trying to say?

7 A. I have no idea. I have never ever been this  
8 situation. I don't know what you guys are doing.

9 Q. But you accused us of working together;  
10 correct?

11 A. I did not. I said -- I don't remember. What  
12 does it say again?

13 Q. I guess y'all all working together, shrug  
14 emoji, cool.

15 A. Yes. So to me it looked like y'all are  
16 working together, if everybody is attached on the email,  
17 people that I did not bring into this chat.

18 MR. WEEKS: Okay. I'm going to hand you I'm  
19 going to mark as 6.

20 (Plaintiff's Exhibit 6 was marked.)

21 BY MR. WEEKS:

22 Q. Have you seen this document before?

23 A. Yes.

24 Q. Okay. And that's a three-page document you  
25 filed with the court; correct?

1 A. Yes.

2 Q. And at the top it says Document Number 21

3 that's filed in front of the United States District

4 Court for this case; correct?

5 A. Correct.

6 Q. It was filed by you on March 10th, 2025;

7 correct?

8 A. Correct.

9 Q. And on the last page of that document on

10 Plaintiff's 6 -- second to last page of this, you signed

11 this in front of a notary public; correct? This is

12 notarized?

13 A. Yes.

14 Q. That's a yes?

15 A. Yes.

16 Q. And you swore, it says here, I declare under

17 penalty of perjury the foregoing is true and correct to

18 the best of my knowledge; correct?

19 A. Yes.

20 Q. And you swore that before this notary who is

21 Joanna Santos; correct?

22 A. Correct.

23 Q. You swore all this was true; correct?

24 A. Correct.

25 Q. I want you to look at Number 5 and read that

1 for the record, if you would.

2 A. I never possessed any intimate images or  
3 videos of the plaintiff.

4 Q. Okay. We talked earlier and you said that  
5 Natalie had sent you nude pictures before; correct?

6 A. Correct.

7 Q. So you have possessed intimate images of the  
8 plaintiff; correct?

9 A. Correct.

10 Q. So you testified falsely by affidavit before  
11 this court; correct?

12 A. Technically what happened is I sent the  
13 wrong -- these papers got mixed up because the copy I  
14 sent you doesn't say that. But this that I signed --  
15 because I had a lot of papers and I represent myself.  
16 So yes, that's a mistake I made. But what I sent you  
17 don't say that.

18 Q. You -- no. You filed an affidavit with the  
19 court that you signed under oath; correct?

20 A. Correct.

21 Q. That has a lie in it; correct?

22 A. Technically, no. That was a mistake. That  
23 was an error on my part, a clerical error.

24 Q. It's a factual error; correct?

25 A. However you want to word it.

1 Q. Are you going to correct this error?

2 A. Yes.

3 Q. Don't you think it's important that you tell  
4 the truth in front of the court?

5 A. Yeah. That's why we're here.

6 Q. Well, you didn't here; right? You filed a  
7 motion last week with an affidavit that contains a  
8 statement that is false; correct?

9 A. I made a mistake, yeah.

10 Q. And you swore under oath that was true;  
11 correct?

12 A. According to this, yes.

13 Q. According to your affidavit; right?

14 A. Yeah.

15 Q. Have you told me the truth here today?

16 A. Yeah.

17 Q. The whole truth and nothing but the truth?

18 A. Yeah. And I also sent you the truth, which is  
19 different from this.

20 (Court reporter requested clarification.)

21 THE WITNESS: I said I also sent a copy of  
22 this to him which is different from this. I had  
23 made a clerical error by getting this signed.  
24 Again, I'm representing myself and I made a  
25 clerical error by not making sure I had the right

1 one signed. But it's cool.

2 BY MR. WEEKS:

3 Q. You used that in reliance upon filing a motion

4 to the court; correct?

5 A. I did.

6 Q. Okay. It contained a false statement that you

7 swore was true under oath?

8 A. Yeah. We make mistakes. I'm human.

9 Q. Let me ask you about something else. You

10 talked to Natalie since y'all broke up; correct?

11 A. Broke up?

12 Q. Since the end of your relationship you've

13 talked on the phone with Natalie?

14 A. I talked to Natalie once. That was after our

15 court case in March.

16 Q. Do you remember what you said to her?

17 A. I remember exactly what I said. I said, What

18 is it that you want? Is it money? What is it that you

19 want? She absolutely could say nothing, couldn't

20 answer.

21 Q. Did you say, You tripping about me sending one

22 girl nude pictures when attorneys, lawyers, judges,

23 everybody about to see your nude photos, like it makes

24 no sense? Did you say that?

25 A. That's not what I said.



1 Q. Not what you said?

2 A. I said, You're tripping about nude pictures

3 being sent to -- I didn't say you tripping about me

4 sending anything.

5 Q. So your testimony is that you did not say,

6 You're tripping about me sending one girl nude pictures

7 when attorneys, lawyers, judges everybody about to see

8 your nude photos, like it makes no sense.

9 You didn't say that?

10 A. No. I didn't use the word "me". I did not.

11 Q. Did you say, Everybody about to see your

12 photos now?

13 A. Yes. I'm telling her because you're pursuing

14 court issues. Now everybody sees your photos. You're

15 making a deal out of one person seeing a female. Now

16 attorneys, judges, possibly a jury, everybody is about

17 to see them, which kind of contradicts her being upset

18 about -- it all don't make sense.

19 It's contradicting her being upset about a

20 female when you now have your eyes on nude photos of

21 her, she does, a judge and possibly a jury.

22 Q. But you said, But everybody about to see your

23 photos now?

24 A. That's what I meant by that statement.

25 Q. I'm asking what you said, not what you meant.

1 Did you say that or did you not say that?

2 A. That's what I meant when I said it.

3 Q. That's not my question. Did you say,

4 Everybody about to see your photos --

5 A. I don't recall.

6 Q. Did you say, But you're tripping because I

7 sent one person a photo?

8 A. I didn't say that.

9 Q. You did not say that?

10 A. I did not say that.

11 Q. Did you say, You look like a fool today. You

12 willing to go back and look like a fool again because

13 I'm going to make you look like a fool again?

14 A. I don't recall saying any of that. We weren't

15 on the phone long enough for that.

16 Q. Did you say, All right. Cool. You want to

17 play childish games, cool. But I got better things to

18 do with my day, but I guess you don't. Did you say

19 that?

20 A. I don't recall saying that.

21 Q. Did you say, Natalie, I've shown you already I

22 can play as long as you want to play?

23 A. I don't recall that. This is a year ago. I

24 don't recall. The conversation was very quick and the

25 main objective of the conversation is what is it that

1 you want? Is it money? What is it? She never answered  
2 the question.

3 Q. Did you say, I know where you live now?

4 A. I've always known where she lived.

5 Q. That's not my question. Did you say, I know  
6 where you live?

7 A. I don't recall saying that, but I've always  
8 known where she lived.

9 Q. But you told me earlier you were certain that  
10 you didn't say, You tripping about me sending one girl  
11 nude pictures when attorneys, lawyers, judges, everybody  
12 about to see your nude pictures?

13 A. My statement was I didn't say I sent it. I  
14 said, You're tripping about one photo being sent to a  
15 female.

16 Q. Did you say, You tripping about me sending one  
17 girl nude pictures?

18 A. I said no. How many times do you want me to  
19 say it. No.

20 Q. You did not say that?

21 A. I did not say that.

22 Q. Did you say, But you're tripping because I  
23 sent one person a photo?

24 A. I did not say that.

25 MR. WEEKS: I'll send these. They're

1 electronic. Give me one second here. Let's take a  
2 quick break.

3 (Brief recess.)

4 MR. WEEKS: We're on Number 7.

5 (Plaintiff's Exhibit 7 will be marked at a later date.)

6 BY MR. WEEKS:

7 Q. This is 7. It's a video with audio. I'm  
8 going to mark it and play it for you.

9 (A portion of Plaintiff's Exhibit 7 was played.)

10 BY MR. WEEKS:

11 Q. So, again, I asked you earlier, Are you  
12 tripping about me sending one girl nude pictures. I'm  
13 going to play it again.

14 (A portion of Plaintiff's Exhibit 7 was played.)

15 BY MR. WEEKS:

16 Q. Did you say, You tripping about me sending one  
17 girl nude pictures?

18 A. No. I don't recall saying that.

19 Q. I'm playing -- that's your voice; right?

20 A. I don't know. I can't tell whose voice that  
21 is.

22 Q. You're denying that's your voice?

23 A. I'm not denying anything. I can't tell whose  
24 voice that is.

25 Q. You don't know your own voice?

1 A. You're playing games now.

2 Q. I'm asking you is that your voice?

3 A. I can't tell.

4 Q. You don't know if that's your voice?

5 A. I don't know if that's my voice. There's a  
6 lot going on in the video.

7 MR. WEEKS: Yeah. Okay.

8 (A portion of Plaintiff's Exhibit 7 was played.)

9 MR. WEEKS: Madam Court Reporter, actually I  
10 am going to ask you to take that down. Can you do  
11 it?

12 THE COURT REPORTER: I don't know how I'm  
13 going to be able to do it. I'll give it a shot.

14 MR. WEEKS: Okay. I'm not going to play the  
15 whole video. This is the first -- this is on  
16 Plaintiff's 7.

17 (Plaintiff's Exhibit 7 as taken down by the court  
18 reporter.)

19 THE WITNESS: Wasting our time. You  
20 (inaudible) about me sending one girl nude pictures  
21 when attorneys, lawyers, judges, everybody going to  
22 see your nude photos.

23 THE COURT REPORTER: I didn't get all of it.

24 MR. WEEKS: One more time.

25 (A portion of Plaintiff's Exhibit 7 was played.)

1 (Plaintiff's Exhibit 7 as taken down by the court  
2 reporter.)

3 Our time. You tripping about me sending one  
4 girl nude pictures when attorneys, lawyers, judges,  
5 everybody about to see your nude photos.

6 THE WITNESS: AI is something else, artificial  
7 intelligence.

8 BY MR. WEEKS:

9 Q. So you believe somebody is manipulating you  
10 here?

11 A. I don't know what's going on, man. I don't  
12 recall saying -- nah, I didn't say that.

13 MR. WEEKS: I'm going to show you what we'll  
14 mark as 8. I'll email these to you, I guess, when  
15 we're done.

16 (Plaintiff's Exhibit 8 will be marked at a later date.)

17 (A portion of Plaintiff's Exhibit 8 was played.)

18 MR. WEEKS: That was 8. So 7 and then that  
19 was 8; right?

20 THE COURT REPORTER: Yes.

21 BY MR. WEEKS:

22 Q. So there's two separate ones. We listened to  
23 that entire 8. That's your voice; right?

24 A. I don't recall.

25 Q. You don't recall if that's your voice?

1 A. I can't tell whose voice it is.

2 Q. You can't say that's your voice?

3 A. I answered the question already.

4 Q. No. Is that your voice?

5 A. I don't know.

6 Q. You don't know if that's your voice or not.

7 Is that Natalie Soto's voice?

8 A. It sounds like her voice. She's loud and

9 clear. She's way over the radio.

10 Q. So you can tell Natalie Soto's voice on the  
11 video, a woman that you dated for a few months, but you  
12 cannot tell your own voice?

13 A. I said it sounds like her. I don't know if  
14 it's her or not.

15 Q. But you can't say if it's you, one way or  
16 another?

17 A. I can't say if it's either one of us.

18 Q. I'm going to play the first one again and ask  
19 you the same question. I'll play the entire thing.

20 (Plaintiff's Exhibit 7 was played.)

21 BY MR. WEEKS:

22 Q. All right. Going back to 7, I played you the  
23 full video. Is that your voice?

24 A. I don't know.

25 Q. You don't know your own voice?

1 A. I'm not going to keep going back and forth.

2 I've already answered the question. It's already

3 documented.

4 Q. You're going to answer my question. Is that

5 your --

6 A. I don't know.

7 Q. You don't know if that's your voice. Is that

8 Natalie Soto's voice?

9 A. I don't know.

10 Q. Did you say, But you're tripping because I

11 sent one person a photo?

12 A. I don't recall.

13 Q. You don't recall saying that. Do you have any

14 reason to dispute that's what you said?

15 A. I don't recall what I -- exactly what was

16 said. I don't recall.

17 Q. So you have no reason to dispute that's what

18 you said?

19 A. I know what I said when I did call Natalie. I

20 told her this is childish. This is silly. What is it

21 that you want? That's what I said.

22 Q. So you're asking the court to believe your

23 recollection of the phone conversation over a recording

24 of the phone conversation? Is that what you're asking

25 the court to do?



1 A. I'm stating what I recall from the  
2 conversation.

3 Q. And memory -- you'd agree that memory can be  
4 imperfect; right?

5 A. (Witness gestures.)

6 Q. Especially if we're upset, sometimes our  
7 memories aren't perfect; right?

8 A. I guess.

9 Q. Wouldn't you agree that a recording, a video-  
10 audio recording is a lot better evidence of what  
11 actually occurred, as opposed to somebody's memory of  
12 what occurred?

13 A. Not really because videos, especially an  
14 audio, it can be audited. So no, I don't agree.

15 Q. Do you have any evidence that this has been  
16 audited or --

17 A. I don't have any evidence of any of this.

18 Q. You have no evidence for your claim that  
19 that's somehow not your voice?

20 A. I don't have any evidence. This is the first  
21 time I'm hearing this.

22 Q. Except when you were on the phone call with  
23 Natalie; right? You heard it then?

24 A. Which was very brief.

25 Q. Are you disputing that you say what's on 7 and

1 8? Those are the two audio recordings we just listened  
2 to. Do you dispute that you said what we hear you  
3 saying on those recordings?

4 A. Yes. I dispute that.

5 Q. Do you have any evidence that supports that  
6 dispute?

7 A. Claims for speculation would be based off an  
8 audio. I mean --

9 Q. I asked about evidence or proof. Do you have  
10 any evidence or proof that that is not you on the  
11 recording?

12 A. Oh, I don't have. No. I don't have any  
13 evidence.

14 Q. So we're just supposed to believe you that  
15 that's not you?

16 A. I mean, you're open to believe whatever you  
17 want. I don't have any evidence. That was the  
18 question. I mean, it's a recording, so I --

19 Q. Now that we've gotten a little deeper into  
20 this deposition, do you have anything that you want to  
21 correct, something that has jogged in your mind that you  
22 now think you want to correct?

23 A. I can't think of anything.

24 Q. That's all I have. You have a chance to say  
25 anything you want on the record. You can do that or you

1 don't have to do that.

2 A. What I really had to say was I'm thinking this  
3 was a deposition where the plaintiff is here, I'm here,  
4 and we can really go in depth on all of this.

5 But she's not here to even answer questions,  
6 because there is a lot of information that's left off.  
7 Text messages, all that stuff, there is no beginning,  
8 there is no end. She basically gave you information  
9 that she wanted you to have. There is no how the  
10 conversation started, because that initial text message  
11 thread started from her.

12 It haven't talked to Natalie in over six  
13 weeks. Natalie contacted me, harassed me on my phone.  
14 I got literally seven text messages before I even  
15 responded. She's leaving off the beginning and the  
16 ending of all of this.

17 And my thing is during all this time of us not  
18 being together, she's with Jimmy. She's gone on a  
19 vacation with Jimmy the following week.

20 I'm trying to understand what damages has she  
21 suffered from all this. Her life hasn't changed. She  
22 ain't lost money. She's on vacation with her ex that  
23 she got back with immediately following the holidays or  
24 during the holidays. So I got a lot of questions.

25 Sounds like she's setting you up, trying to

1 get money out of you. That's what it sounds like.

2 And the funny thing is she made a statement in  
3 one of these text messages saying that my wife takes  
4 care of me, that I don't have any money. Yet she's  
5 suing me for money, knowing I don't have any assets and  
6 no job. So it's funny that we're going through all of  
7 this.

8 And, again, it's still funny to me that, one,  
9 I'm being sued for supposedly sharing nude photos, yet  
10 Dawn, Natalie and now you have shared nude photos of  
11 another woman. Yeah. Another woman that doesn't even  
12 know about you guys sharing the photos. So basically  
13 y'all are breaking the same law that I'm being accused  
14 of because her photos weren't X'ed out. They weren't  
15 marked out. So all of y'all are guilty of sharing nude  
16 photos.

17 Q. Is that all?

18 A. I mean, I don't have nothing else. I pretty  
19 much said there's no beginning or end. Natalie is  
20 leaving out a lot of details, especially when she  
21 started harassing me, how all this all came about. I  
22 moved on with my life.

23 She contacted me. So she had a purpose and a  
24 reason to contact me and that was to start some trouble,  
25 because I wasn't contacting her.

1 And she also left out we went to court in  
2 March and she told these same stories. And the judge  
3 threw the case out because she was trying to say she  
4 felt threatened for her life as if I threatened to kill  
5 her or something. She wanted a restraining order. The  
6 judge threw that out.

7 She files a court case on me, Cobb County. I  
8 didn't know I had warrant out for my arrest for two  
9 months. They know where I live. They done served me  
10 papers there before.

11 She waits until I go to church on Father's Day  
12 on January -- June the 16th, calls the cops on me. Had  
13 me arrested in front of all my church family, my wife,  
14 my kid, my parents, everybody, in the middle of me on my  
15 job. I lose my job the next day after I got arrested.

16 So it just looks like to me she's out to get  
17 me. She's going to the extreme to try to make sure she  
18 ruins my life.

19 Q. Okay. I have a little bit more. You said  
20 that this evidence we looked at today is incomplete. I  
21 sent you a request for production of documents; correct?

22 A. You might have. Man, you've sent me so much  
23 stuff, man. I'm not an attorney, man. I'm doing the  
24 best I can to try to get you this -- yes. You probably  
25 have sent me that.

1 Q. I sent you a request for production of  
2 documents.

3 A. I don't have documents, though. I didn't  
4 keep -- when -- after -- she contacted me in February,  
5 the second week of February, when all this transpired,  
6 the text messages. Me and Natalie didn't talk -- I  
7 heard nothing from her again until I got served  
8 documents in March to go to court.

9 I got rid of all the text messages, everything  
10 -- any documents I had, I got rid of them. So basically  
11 I either need to hire somebody or get all our records  
12 subpoenaed so I can get documents because I deleted  
13 everything because I didn't think I was ever going to  
14 hear from Natalie again because I blocked her.

15 And I was moving on with my life. I thought  
16 that was the end. I had no idea I was about to be going  
17 to court a month later.

18 So no, I don't have documents. So that's why  
19 you never received documents from me.

20 Q. You didn't even let me ask my question. Let  
21 me ask my question. I sent you a document request,  
22 request for production of documents; correct?

23 A. I believe so. I don't recall.

24 Q. It was served on you. We had a hearing the  
25 other day when the judge ordered you to answer those and

1 send everything to me by 5:00 o'clock; correct?

2 A. Yes.

3 Q. And you did not send me any documents;

4 correct?

5 A. No, I didn't.

6 Q. So you have no documents to support anything

7 you've said here today; correct?

8 A. I don't.

9 Q. That's all I have. Thanks.

10 A. I can get them, though. Trust me. I can get

11 them.

12 Q. If you can get them, why haven't I gotten them

13 up till today?

14 A. Because the questions you're asking me are

15 not -- we're in a deposition that does not really allow

16 me -- I didn't need the documents technically, because

17 my documents, according to all the questions you're

18 asking me, wouldn't do me any good anyway.

19 Q. No. I asked for any documents supporting any

20 defense you might have to this case or any documents you

21 might use at trial. I asked you that months ago. And

22 you --

23 A. I don't have them.

24 Q. You don't have any documents to support --

25 A. I deleted all my text messages.

1 Q. Let me finish. You don't have any documents  
2 to support anything you said here today; correct?

3 A. No.

4 Q. And you said but you could get them. Well,  
5 how could you get them?

6 A. I would have to pay to get them or I would  
7 have ask the judge to subpoena all our records or our  
8 text messages.

9 Q. And you haven't done any of that and discovery  
10 closes tomorrow; correct?

11 A. No, I haven't did any of that because the  
12 judge hasn't even responded to other motions that I  
13 filed.

14 Q. We're not talking about the judge. You  
15 haven't gotten any records. You know this case is --  
16 the discovery period was over last week. Now it's over  
17 as of this week. You know that; right?

18 A. I do now.

19 Q. And you produced no documents to support  
20 anything you said in this case.

21 A. No. Because I don't have the money to get  
22 those documents. I would request them with the  
23 subpoena.

24 MR. WEEKS: That's all I have. No further  
25 questions.



1 THE COURT REPORTER: Are you ordering a  
2 transcript?

3 MR. WEEKS: Yes, ma'am.

4 (Deposition concluded at 2:57 p.m.)

5 (Pursuant to Rule 30(e) of the Federal Rules of  
6 Civil Procedure and/or O.C.G.A. 9-11-30(e), signature of  
7 the witness has been reserved.

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March 20, 2025

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1                    C E R T I F I C A T E

2    STATE OF GEORGIA:

3    COUNTY OF DEKALB:

4

5            I hereby certify that the foregoing transcript was  
6    reported, as stated in the caption, and the questions  
7    and answers thereto were reduced to typewriting under  
8    my direction; that the foregoing pages represent a  
9    true, complete, and correct transcript of the evidence  
10   given in said proceeding, and I further certify that I  
11   am not of kin or counsel to the parties in the case; am  
12   not in the employ of counsel for any of said parties;  
13   nor am I in any way interested in the result of said  
14   case.

15            This, the 8th day of April 2022.

16

17                    -----  
18                    Nancy G. Lucas, CCR  
19                    Certificate No. B-1366

20

21

22

23

24

25

26

1 DISCLOSURE OF NO CONTRACT

2 I, Nancy G. Lucas, Certified Court Reporter, do  
3 hereby disclose, pursuant to Article 10.8 of the Rules  
4 and Regulations of the Board of Court Reporting of the  
5 Judicial Council of Georgia, that I am a Georgia  
6 Certified Court Reporter; I was contracted by the party  
7 taking the deposition to provide court reporting  
8 services for this deposition; I will not be taking this  
9 deposition under any contract that is prohibited by  
10 O.C.G.A 15-14-37(a) and (b) or Article 7.C of the Rules  
11 and Regulations of the Board; and I am not disqualified  
12 for a relationship of interest under O.C.G.A.  
13 9-11-28(c).

14  
15 There is no contract to provide reporting services  
16 between myself or any person with whom I have a  
17 principal and agency relationship nor any attorney at  
18 law in this action, party to this action, party having a  
19 financial interest in this action, or agent for an  
20 attorney at law in this action, a party to this action  
21 or party having a financial interest in this action.  
22 Any and all financial arrangements beyond my usual and  
23 customary rates have been disclosed and offered to all  
24 parties.  
25

-----  
Nancy G. Lucas, CCR  
Certificate No. B-1366

1 CASE: Natalie Soto Vs. Wendell Holmes, Jr.

2 NAME OF WITNESS: Wendell Holmes, Jr.

3 The preceding deposition was taken  
4 in the matter, on the date and at the time and  
5 place set out on the title page hereof.

6 It was requested that the deposition  
7 be taken by the reporter and that same be  
8 reduced to typewritten form.

9 It was agreed by and between counsel  
10 and the parties that the deponent will read and  
11 sign the transcript of said deposition. Said jurat  
12 is to be returned, within 30 days after the transcript  
13 is made available, to the following address:

14 Gallo Legal Services  
15 2900 Chamblee Tucker Road  
16 Building 13, First Floor  
17 Atlanta, Georgia 30341

18 If an errata is executed and returned  
19 to GLS within the 30 days allocated by law,  
20 the executed errata will be sent to the taking  
21 attorney for filing with the original transcript.  
22 Should an executed errata not be forwarded from  
23 GLS to the taking attorney for filing, the  
24 deposition was not reviewed and signed by the  
25 deponent within 30 days.

March 20, 2025

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1 NAME OF CASE: Natalie Soto Vs. Wendell Holmes, Jr.

DATE OF DEPOSITION: 03/20/2025

2 NAME OF WITNESS: Wendell Holmes, Jr.

3 GLS JOB NO.: 122387

4 CERTIFICATE

5 Before me this day personally  
appeared WENDELL HOLMES, JR., who, being duly  
6 sworn, states that the foregoing transcript of  
his/her deposition, taken in the matter, on  
7 the date and at the time and place set out on  
the title page hereof, constitutes a true and  
8 accurate transcript of said deposition.

9 \_\_\_\_\_

10 WENDELL HOLMES, JR.

11 SUBSCRIBED and SWORN to before me

12 this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

13 in the jurisdiction aforesaid.

14

15 \_\_\_\_\_  
My Commission Expires Notary Public

16 STATE OF \_\_\_\_\_

17 COUNTY/CITY OF \_\_\_\_\_

18

19 ☐ No changes made to the Errata Sheet;

20 therefore, I am returning only this signed,

21 notarized certificate.

22 ☐ I am returning this signed,

23 notarized certificate and Errata Sheet with

24 changes noted.

25

March 20, 2025

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1 Errata Sheet

2 NAME OF CASE: Natalie Soto Vs. Wendell Holmes, Jr.

3 DATE OF DEPOSITION: 03/20/2025

4 NAME OF WITNESS: Wendell Holmes, Jr.

5 Reason Codes: 1. To clarify the record

6 2. To correct transcription errors

7 3. Other

8 \_\_\_\_\_

9 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

10 From \_\_\_\_\_ to \_\_\_\_\_

11 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

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21 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_

22 From \_\_\_\_\_ to \_\_\_\_\_

23

24 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

25 Wendell Holmes, Jr.

March 20, 2025

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1 Errata Sheet

2 NAME OF CASE: Natalie Soto Vs. Wendell Holmes, Jr.

3 DATE OF DEPOSITION: 03/20/2025

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5 Reason Codes: 1. To clarify the record

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22 From \_\_\_\_\_ to \_\_\_\_\_

23

24 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

25 Wendell Holmes, Jr.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy and/or an electronic copy of the within and foregoing DEPOSITION OF WENDELL HOLMES, JR., and all Exhibits thereto, was served upon all parties to this action and/or counsels of record in this action via electronic filing through the Court's CM/ECF system which will automatically send an electronic copy of said pleading to all electronic service registrants and attorneys of record, and/or via email, and/or via USPS First Class Mail with postage paid and addressed as follows:

Wendell Holmes, Jr.  
5934 Rosie Lane, SE  
Mableton, GA 30126  
wendellholmesjr@gmail.com

This 9th day of April, 2025.

/s/ Joseph W. Weeks  
Joseph W. Weeks  
Attorney for Plaintiff  
Georgia Bar No. 912341

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